

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, :

against, :

BETIM KAZIU, :

Defendant. :

DECLARATION

09 CR 660 (JG)

Henry J. Steinglass declares under penalty of perjury pursuant to 28 U.S.C. Sec. 1746:


1. I am an attorney duly admitted to the practice of law in the State of New York and the United States District Court for the Eastern District of New York.

2. Together with David Stern and Joshua Dratel, I am counsel for Betim Kaziu, the defendant in the above-captioned case.

3. I submit this Declaration regarding the defense reply to the prosecution's papers, dated 5/20/11, regarding suppression of items seized in the search of Mr. Kaziu's apartment in Prizren, Kosovo.

4. To the extent that there is factual information for this reply, the information is set forth in the accompanying reply memorandum of law and is incorporated herein by reference. In particular, Mr. Kaziu's post-arrest statements to the Kosovo Police Service (see reply memorandum of law, pg. 8, n. 8, and Exhibit "A" thereto) were provided as discovery material by the prosecution in this case.

Dated: New York, New York
June 13, 2011


Henry J. Steinglass